LOG OF MEETING

SUBJECT: Discuss in vitro alternatives to the corrosivity test.

DATE: June 15, 1995

ACE: East West Towers, room 711

ENTRY SOURCE: Kailash Gupta

COMMISSION REPRESENTATIVES: Kailash Gupta (EHHE), Bob Poth, Mary Toro (CRM), Harleigh

Ewell (GCRA)

NON-COMMISSION REPRESENTATIVES: Michael Lemov, and Randall Benn of Winston and Strawn, Elizabeth Thornton of InVitro International (IVI)

SUMMARY:

Dr. Thornton explained how the CORROSITEX method works to assess the corrosive potential of substances; she noted that the method has been in the market since 1992, and has been approved by the Department of Transportation and the Occupational Safety and Health Administration. It is in the process of approval by EPA as an alternative to the pH determination as an indicator of corrosivity. Issues of CPSC policy on the use of animal tests, frequency of such tests by CPSC and industry, products involved, etc. were discussed. Staff views were sought on publication of a policy on the use of non-animal alternatives for corrosivity testing and a 3rd party certification program for noncorrosive products. Staff indicated that the modification of regulations or publication of a policy would depend on the need, scientific basis, and availability of required resources and IVI could either write a letter or submit a petition, or both. The staff generally does not favor disclaimer labeling (such as "SAFE" "NONTOXIC") since it tends to give a false sense of security, however, this issue would be examined on a case by case basis.

